

LATHAM & WATKINS LLP
Daniel Scott Schechter (Bar No. 171472)
daniel.schechter@lw.com
355 South Grand Avenue
Los Angeles, California 90071-1560
Telephone: (213) 485-1234
Facsimile: (213) 891-8763

LATHAM & WATKINS LLP
David F. Kowalski (Bar No. 265527)
david.kowalski@lw.com
12670 High Bluff Drive
San Diego, CA 92130
Telephone: (858) 523-5400
Facsimile: (858) 523-5450

LATHAM & WATKINS LLP
Blair Connelly (Bar No. 174460)
blair.connelly@lw.com
William O. Reckler (pro hac vice)
william.reckler@lw.com
Paul A. Serritella (pro hac vice)
paul.serritella@lw.com
885 Third Avenue
New York, New York 10022-4834
Telephone: (212) 906-1200
Facsimile: (212) 751-4864

Attorneys for Plaintiff CrossFit, Inc.

MANNING & KASS, ELLROD, RAMIREZ, TRESTER
LLP
Kenneth S. Kawabata (Bar No. 149391)
ksk@manningllp.com
550 West C Street, Suite 1900
San Diego, CA 92101
Telephone: (619) 515-0269
Facsimile: (619) 515-0268

MANNING & KASS, ELLROD, RAMIREZ, TRESTER
LLP
Anthony J. Ellrod (Bar No. 136574)
aje@manningllp.com
801 S Figueroa St.
Los Angeles, CA 90017
Telephone: (213) 624-6900
Facsimile: (213) 624-6999

Attorneys for Defendant National Strength &
Conditioning Association

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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 CROSSFIT, INC., a Delaware
11 corporation,

12 Plaintiff,

13 v.

14 NATIONAL STRENGTH AND
15 CONDITIONING ASSOCIATION, a
Colorado corporation,

16 Defendant.

CASE NO. 14cv1191-JLS(KSC)

**JOINT MOTION FOR PROTECTIVE
ORDER**

Judge: The Honorable Janis L.
Sammartino

The Honorable Karen S.
Crawford

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18 Plaintiff CrossFit, Inc. (“CrossFit” or “Plaintiff”) and Defendant the
19 National Strength and Conditioning Association (“NSCA” or “Defendant”) having
20 agreed that the materials to be exchanged throughout the course of the litigation
21 between the parties may comprise potentially confidential, non-public, commercial
22 or personal material, hereby agree and stipulate, by and through their respective
23 counsel and subject to the Order of this Court, to the proposed Protective Order
24 lodged herewith.
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Respectfully submitted,

Dated: August 6, 2014

LATHAM & WATKINS LLP

MANNING & KASS, ELLROD,
RAMIREZ, TRESTER LLP

By: /s/ Paul A. Serritella
Paul A. Serritella
(*pro hac vice*)

By: /s/ Kenneth S. Kawabata
Kenneth S. Kawabata
(Bar No. 149391)

885 Third Avenue
New York, New York 10022-4834
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
paul.serritella@lw.com

550 West C Street, Suite 1900
San Diego, CA 92101
Telephone: (619) 515-0269
Facsimile: (619) 515-0268
ksk@manningllp.com

*Counsel for Plaintiff CrossFit,
Inc.*

*Counsel for Defendant National
Strength & Conditioning
Association*

1 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative
2 Policies and Procedures of the United States District Court for the Southern
3 District of California, I certify that the content of this document is acceptable to
4 counsel for the Defendant and that I have obtained authorization from Kenneth S.
5 Kawabata to affix his electronic signature to this document.
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10 /s/ Paul A. Serritella

11 Paul A. Serritella
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CERTIFICATE OF SERVICE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

CROSSFIT, INC., v. NATIONAL STRENGTH AND CONDITIONING
ASSOCIATION,

District Court Case No. 14-cv-1191-JLS(KSC)

I, Paul A. Serritella, hereby certify that I am over the age of eighteen and not a party to the within action; I am employed by Latham & Watkins LLP in the County of New York at 885 Third Avenue, New York, New York 10022.

On the 6th day of August, 2014, I served the document below described as:

JOINT MOTION FOR PROTECTIVE ORDER

The document(s) was/were served by the following means:

- **BY ELECTRONIC TRANSMISSION VIA NEF:** I hereby certify that I electronically filed the foregoing document(s) with the Clerk of Court using the CM/ECF system, which sent Notifications of Electronic Filing to the persons at the e-mail addresses listed immediately below. Accordingly, pursuant to the Court's Local Rule 5.4(c), I caused the document(s) to be sent electronically to the persons listed immediately below.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Executed on August 6, 2014 at New York, New York.

/s/ Paul A. Serritella

Paul A. Serritella

SERVICE LIST
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

CROSSFIT, INC., v. NATIONAL STRENGTH AND CONDITIONING
ASSOCIATION,

District Court Case No. 14-cv-1191-JLS(KSC)

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Kenneth S. Kawabata

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550 West C Street

Suite 1900

San Diego, CA 92101

Telephone: (619) 515-0269

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Los Angeles, CA 90017

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